

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

YOLANDA BRADFORD,

Plaintiff,

v.

ZEELOOL, INC.,

Defendant.

Case No.: 4:24-cv-00745

Honorable Alfred H. Bennett

**MOTION FOR EXTENSION OF TIME TO FILE JOINT DISCOVERY/CASE
MANAGEMENT PLAN UNDER RULE 26(f) OF THE
FEDERAL RULES OF CIVIL PROCEDURE**

NOW COMES Yolanda Bradford (“Plaintiff”) seeking to extend the time to file a Joint Discovery/Case Management Plan under Fed. R. Civ. Pro. 26(f) to allow perfection of service of process on Defendant Zeelool, Inc. (“Defendant”).

1. On April 25, 2024, Plaintiff believed that Summons and Service of Process to Defendant’s registered agent was fully executed. [Dkt. 11]. However, on April 26, 2024, Plaintiff received a letter stating that service was rejected as Defendant’s registered agent has resigned as the registered agent for Defendant and service of process was not perfected.
2. Accordingly, Plaintiff respectfully requests a thirty (30) day extension of time up to and including, June 28, 2024, to attempt to re-serve Defendant via its new registered agent, if any, or to allow time for personal service.
3. Moreover, since Defendant has not been served in this case, Plaintiff respectfully also requests a forty-five (45) day extension to file a Joint Discovery/Joint Case Management Report.

4. Plaintiff makes this request not to cause any delays, but to fully comply with the requirements set forth in Rule 4 of the Fed. R. Civ. Pro. and this Honorable Court's local rules.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter Order extending the parties deadline to file the Joint Case Management Report up to and including July 17, 2024 and for any other relief deemed just and appropriate.

Dated: May 28, 2024

Respectfully Submitted,

/s/ Marwan R. Dahir

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 28, 2024, a copy of the foregoing was filed electronically via CM/ECF with the United States District Court Southern District of Texas, with notification being sent electronically to all counsel of record.

/s/ Marwan R. Daher